

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

In Re:	Chapter 13
Rhoda Janet Fischer	Case No. 17-10502-MDC
Debtor,	

U.S. Bank National Association, as Trustee of the Igloo Series III Trust	
Movant,	
v.	Hearing: September 22, 2020 at 10:30 a.m.
Rhoda Janet Fischer	Courtroom # 2
Debtor,	
and	
William C. Miller, Esquire	11 U.S.C. §362(d) and §1301
Trustee,	
and	
Andrew E. Fischer	
Party-in-Interest	
Respondents.	

**CERTIFICATION IN SUPPORT OF MOTION OF U.S. BANK NATIONAL
ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST FOR RELIEF
FROM THE AUTOMATIC STAY
AND CO-DEBTOR STAY AS TO CERTAIN REALTY KNOWN AS
1103 TANNERIE RUN ROAD, AMBLER, PA 19002**

1. I, Raymond Vandenham Jr, am a
Asst Vice President for BSI Financial
Services as servicer for U.S. Bank National Association, of the Igloo Series III Trust
(hereinafter "Movant") have full knowledge of the above-captioned matter and I am
fully qualified and authorized to make the following Certification in support of the
within relief application on behalf of the Movant. This certification is based on the

loan payment records of BSI Financial Services. These records are regularly maintained in the regular course of business and it is the regular practice to make and maintain these records. These records reflect the loan payments are noted in the records at the time of receipt by persons whose regular duties include recording this information. I maintain these records and regularly use and rely upon them in the performance of my duties.

2. Movant is U.S. Bank National Association, as Trustee of the Igloo Series III Trust (hereinafter "Movant"), and is the proper party in interest.

3. On March 11, 2008, the Debtor, Rhoda Janet Fischer, and non-filing co-debtor, Andrew E. Fischer, executed a Mortgage in favor of First Interstate Financial Corp., with respect to certain real property owned by the Debtor and Co-Debtor located at 1103 Tannerie Run Road, Ambler, PA 19002 (the "Property") and recorded in the Office of the Recorder of Deeds of Montgomery County on March 27, 2008, at Mortgage Book 12357, Page 02054 (the "Mortgage") in which Debtor is the title holder.

4. 1103 Tannerie Run Road, Ambler, PA 19002 is the Subject Property at issue.

5. Said mortgage was assigned to the Movant on March 19, 2018, and said assignment of mortgage was recorded with the Recorder of Deeds in Montgomery County, PA on March 20, 2018, at instrument #2018017235, and is a matter of public record. (Please see Exhibit A.)

6. Debtor's Chapter 13 petition was filed on January 24, 2017.

7. The Debtor's confirmed Amended Chapter 13 Plan provides for the Debtor to cure arrears of \$93,821.53 through the plan and to make post-petition payments directly to Movant.

8. The pre-petition arrears as listed in Movant's claim 1-1 are \$93,821.58.

9. Since the date of filing, the Debtor has paid a total of \$82,873.54 in payments to Movant.

10. To be current post-petition, the Debtor should have made the following payments:

- Four (4) payments of \$2,341.25 for February 1, 2020 – May 1, 2020
- Three (3) payments of \$2,098.99 for June 1, 2020 – August 1, 2020
- Less funds in suspense of \$579.62

11. The following is a summary of the debtor's post-petition payment history:

Payment amount	Payment Due Date	Payment Amount Received	Date Payment Received
\$2,270.14	2/01/2017	\$2,214.26	2/08/2017
\$2,270.14	3/01/2017	\$2,214.26	3/07/2017
\$2,270.14	4/01/2017	\$2,243.85	4/18/2017
\$2,270.14	5/01/2017	\$2,243.85	5/24/2017
\$2,270.14	6/01/2017	\$2,243.85	6/27/2017
\$2,270.14	7/01/2017	\$2,243.85	7/28/2017
\$2,270.14	8/01/2017	\$2,243.85	8/31/2017
\$2,270.14	9/01/2017	\$2,245.00	10/18/2017
\$2,270.14	10/01/2017	\$2,280.00	12/1/2017
\$2,270.14	11/01/2017	\$2,280.00	1/03/2018
\$2,270.14	12/01/2017	\$2,350.00	2/05/2018
\$2,270.14	1/01/2018	\$2,300.00	3/07/2018
\$2,270.14	2/01/2018	\$2,303.00	4/03/2018
\$2,270.14	3/01/2018	\$2,304.00	5/02/2018
\$2,270.14	4/01/2018	\$2,260.00	6/01/2018
\$2,270.14	5/01/2018	\$2,255.00	7/06/2018
\$2,270.14	6/01/2018	\$2,287.00	8/02/2018
\$2,270.14	7/01/2018	\$2,278.00	9/06/2018
\$2,270.14	8/01/2018	\$2,279.00	10/02/2018
\$2,270.14	9/01/2018	\$2,290.00	11/01/2018
\$2,270.14	10/01/2018	\$2,291.00	11/30/2018
\$2,270.14	11/01/2018	\$2,292.00	1/02/2019
\$2,270.14	12/01/2018	\$2,291.00	2/01/2019
\$2,270.14	1/01/2019	\$2,293.00	3/05/2019
\$2,270.14	2/01/2019	\$2,293.75	4/01/2019
\$2,270.14	3/01/2019	\$2,294.84	5/01/2019
\$2,270.14	4/01/2019	\$2,295.88	5/29/2019
\$2,270.14	5/01/2019	\$2,396.76	6/26/2019
\$2,341.25	6/01/2019	\$2,397.17	7/31/2019
\$2,341.25	7/01/2019	\$2,397.18	9/03/2019
\$2,341.25	8/01/2019	\$2,359.19	10/02/2019
\$2,341.25	9/01/2019	\$2,411.00	12/05/2019
\$2,341.25	10/01/2019	\$2,382.00	1/02/2020
\$2,341.25	11/01/2019	\$2,371.00	2/04/2020

\$2,341.25	12/01/2019	\$2,374.00	4/14/2020
\$2,341.25	1/01/2020	\$2,375.00	5/18/2020
\$2,341.25	2/01/2020	\$0.00	-----
\$2,341.25	3/01/2020	\$0.00	-----
\$2,341.25	4/01/2020	\$0.00	-----
\$2,341.25	5/01/2020	\$0.00	-----
\$2,098.99	6/01/2020	\$0.00	-----
\$2,098.99	7/01/2020	\$0.00	-----
\$2,098.99	8/01/2020	\$0.00	-----
TOTAL: \$97,955.89		\$82,873.54	

12. The post-petition arrears are **\$15,082.35** as of August 15, 2020.

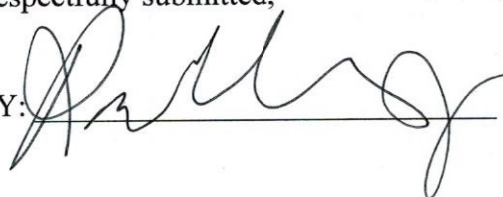
13. The Debtor is in the default with the note and mortgage.

I CERTIFY under penalty of perjury that the foregoing is true and correct.

Executed on 8/27/2020

Respectfully submitted,

BY:

A handwritten signature in black ink, appearing to be "R. L. [unclear]", written over a horizontal line.